



83rd WIPP QUARTERLY
July 29, 2003

Energy, Minerals and Natural Resources Department
Porter Hall, First Floor, Piñon Building
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

AGENDA

10:00	Introductions	Anne deLain W. Clark
10:05	EEG Update	EEG
10:20	Governor's Task Force Update	Anne deLain W. Clark
10:40	NMED Update	Steve Zappe
11:20	Break	
11:30	<u>DOE Update including:</u> Status of pending HWA permit modifications DOE's plans for any additional modifications Status of RH and CCF	DOE
12:00	Lunch	
1:30	1. DOE's plans for the Salt Pile and surface water diversion (no changes from those proposed in the NOI sent to NMED last fall.) 2. Discussion on how/why polyethylene is incorporated into criticality calculations and the results of testing to show that 25% poly bounds the maximum possible in non-supercompacted waste. 3. Discussion on the reorganization of CBFO 4. Discussion of TRUPACT II - 157 Incident Closeout. 5. Congressional efforts to change waste characterization requirements – impact of such legislation on EPA's characterization requirements 6. Status of negotiations to ship waste from NTS 7. DOE/NNSA proposal for an MPF (modern pit facility) - impact the schedule to close WIPP	Discussions lead by DOE
2:45 to 3:00 PM break		
4:00	Role of EEG	Matthew Silva
4:30	Closing remarks and Adjourn	

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WIPP Quarterly Review

July 29, 2003

Activities Update for NMED's RCRA Permits Program

1. Ongoing Permitting Process

- NMED received additional permit modification notifications from DOE/WTs
 - May 30, 2003 - Class 1 (update emergency coordinator names)
 - June 11, 2003 - Class 1 (upgrade to Central Monitoring System)
- Remote-Handled TRU Waste Class 3 modification request
 - NMED received response to Notice of Deficiency (**NOD**) comments on May 5, 2003
 - NMED currently developing second NOD after evaluating response
- Change in operational control Class 1* modification request
 - Received February 28, 2003
 - No agency action taken yet to approve or deny
- Electronic Data Management Class 3 modification
 - NMED will issue NOD in September 2003
- Closure Plan Amendment (Design Change) Class 3 modification request
 - NMED will coordinate with EPA ORIA on review of panel closure design
- Waste Characterization Updates and Other Process Improvements Class 2 modification request
 - Received request on May 14, 2003
 - Public comment period ended on July 15, 2003
 - Received 136 pages of comments from 12 commentors
 - NMED will likely extend final determination 30 days until September 11, 2003
- Construction and Use of Hazardous Waste Disposal Units Class 3 modification request
 - Received request on May 14, 2003
 - Public comment period ended on July 15, 2003
 - Received 23 pages of comments from 7 commentors
 - Currently evaluating comments
- Remove PCB Prohibition Class 1* modification request
 - Received request on May 19, 2003
 - NMED rejected request on May 20, 2003
 - NMED received letter from EPA Region 6 on June 12, 2003, affirming NMED's responsibility "to determine the most appropriate permit modification classification"
- Remove PCB Prohibition Class 2 modification request
 - Received request on May 23, 2003
 - Public comment period ended on July 28, 2003
 - Haven't tabulated comments yet
 - NMED will likely combine final determination with other Class 2 modifications on September 11, 2003

- Other reports/notifications received
 - Quarterly progress report for Solid Waste Management Unit Activities, May 7, 2003
 - Notice of planned physical alteration (Salt Pile reconfiguration), June 10, 2003
 - Intent to commence shipment of CH TRU waste from NTS, June 25, 2003
 - Photographs of panel closure construction project, July 18, 2003
 - Quarterly progress report for Solid Waste Management Unit Activities, July 25, 2003

2. RCRA-related Audits

- ANL-E/CCP audit (A-02-03), September 9-13, 2002
 - See ANL-E/CCP audit, February 10-14, 2003
- ANL-E/CCP Solids and CAR verification (A-03-13), February 10-14, 2003
 - NMED observed audit
 - Received audit report March 6, 2003
 - Audit report also included activities observed at September 9-13, 2002 audit
 - NMED provided comments on audit report April 22, 2003
 - Received revised final audit report April 28, 2003
 - Issued approval letter May 8, 2003
- RFETS Recertification (A-03-03), March 3-7, 2003
 - NMED observed audit
 - Audit report received April 25, 2003
 - Currently under review
- INEEL Labs and Sampling Process (A-03-15), May 19-23, 2003
 - NMED observed audit
 - Awaiting audit report
- Hanford Recertification (A-03-14), June 16-20, 2003
 - NMED observed audit
 - Awaiting audit report
- LANL Entech HSG (A-03-24), July 8-10, 2003
 - NMED observed audit
 - Awaiting audit report
- RFETS Solids Sampling (A-03-22), July 22-24, 2003
 - NMED observed audit
 - Awaiting audit report
- Upcoming audits
 - Advanced Mixed Waste Treatment Facility (**AMWTF**) (A-03-05, August 18-22, 2003)
 - ANL-E/CCP Solids Follow-up (A-03-26), August 26-28, 2003
 - Hanford CCP Process Line (A-03-25), September 9-12, 2003
 - LANL Recertification (A-03-27), September 22-26, 2003
 - LANL CCP Process Line (A-03-28), September 22-26, 2003
 - NTS/CCP Recertification, TBD
 - ANL-E/CCP Recertification (A-03-XX), October 7-10, 2003
 - SRS Recertification (A-04-XX), October 21-24, 2003
 - RFETS Recertification, March 2004

- Rescheduling of audits
 - NMED expressed concern over lack of formal notification if a pre-noticed audit was postponed or delayed in letter dated April 28, 2003
 - Response by Permittees received May 19, 2003

3. Compliance issues

- Conducted unannounced inspection of WIPP compliance with Permit, May 6-8, 2003
 - No violations identified during inspection
 - NMED personnel requested additional information during inspection, received May 16, 2003
 - NMED will issue final inspection findings within six months of completion of inspection

4. Other activities

- Meetings/presentations
 - None in past quarter
- Status of New Mexico's Hazardous Waste Program
 - Mr. Tod Rockefeller filed petition with EPA to withdraw New Mexico's hazardous waste program, April 18, 2001
 - Petition transfer to EPA Region 6 for consideration, June 6, 2001
 - EPA issued final determination denying petition, July 9, 2003
- Legislation
 - Senator Domenici introduced S. 1424 (Energy and Water Development appropriations bill), July 17, 2003
 - Language in Section 310 would eliminate chemical sampling and analysis requirements, reduce 100% visual examination/ radiography to statistical sampling
 - NMED will issue a press release
- NMED staffing
 - Reassignment of bureau chiefs throughout NMED, Sandra Martin appointed Acting Chief of Hazardous Waste Bureau, July 3, 2003
 - Sandra Martin also designated as single point of contact for NMED WIPP permit issues
 - Two vacant positions in NMED's WIPP project will likely be advertised in August, 2003

Sign - In

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June 29, 2003
83rd WIPP Quarterly

EEG
Matthew Silva

Handout - discuss reviews, comments, edits, other activities. EEG website now has EEG comments of Permit mods (Focus Page). Presentations & publications, meetings

NMEMRD
Anne Clark

Handout. Expectations for shipments by rail, working document developed by WIPP working group. WGA mtg on rail issues May 28-30 (contentious mtg) - start w/ truck PLG and look for delta from it. DOE^{HQ} response was extremely negative, WGA believes need to find consensus among other regional groups without compromising needs of western states. Ongoing problems with finding from DOE HQ for state perms. NM has slight increase in finding (for inflation?), but not keyed to accelerated shipment schedules.

WGA negotiated to support CA to delay NTS shipments. CA may not have acted early enough, negotiations have continued to find resolution.

~~UMED~~ = Handout

DOE
Roger Nelson

Exceeding all expectations for compliance. Panel 2 started 3/12/03, estimated fill date 10/04. Made point of VOC concentrations. Have analyzed bTSG & changed estimate of VOC from '95 application. Developing a report detailing arguments, available for review & comment within next few months

Rectines of explosion wall, completed 7/14/03

Audit "toranza", implying it is overdone & expensive.

CCP is meant to supplement programs @ sites, accelerate shipments. Cost study determined per drum cost \$3900. Preferred cost would be \$0

(3)

⑥ NTS shipments thru CA - waste originated in LANL in CA, waste already characterized & vendors left a while ago ^(gone to Hanford). Only mobile loaders recently removed such that shipments are no longer possible. Total inventory ~ 8 shipments.

Dorothy Reade pushing for resumption of escorts in NM based upon DOE offering to do it in CA to "sweeten the deal."

⑦ Impact of MPF located @ WIPP - if built, ~ 1000 containers/yr of waste would be eligible for disposal at WIPP. No crystal ball - no matter where located, MPF will impact schedule of closure @ WIPP

Matthew Role of EEG

Silva

Est 1978 between DOE & NM, in 1988 assigned to NM Tech. Diversified group of scientists & engineers, offices in ALB & Carlsbad. Carlsbad still do monitoring & audits; tech review in ALB. Papers, conferences make statements as requested (NAS, NGA/WGA). Testimony to elected/appointed officials.

Impact of EEG reviews on ^{WIPP} project. Ex - relocate repository, abandon insitu tests in '92. Continuation & development for PA in 1988. TP-II, Inclusion of human intrusion in PA.

Changes to requirements: double vs single containers; hi wattage waste @ LANL; inspection requirements (CVSA); waste stream cont (EPA);



ENVIRONMENTAL EVALUATION GROUP

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LXXXIII QUARTERLY MEETING

**U.S. Department of Energy
Environmental Evaluation Group
N.M. Energy, Minerals, and Natural Resources
N.M. Environment Department
N.M. Attorney General**

Environmental Evaluation Group
<http://www.eeg.org>

**July 29, 2003
Santa Fe**

Reviews

- ☒ **Conducted evaluation and provided comments on DOE Modular Emergency Response Radiological Transportation Training course for NM Office of Emergency Services and Security**

- ☒ **Provided comments to CBFO on RH TRU SAR related documents (PTSR, SER, PSAR)**

Reviews (continued)

- ☒ **Provided comments on six Class 2 PMRs to NMED (Drum Age Criteria, Underground Booster Fans, Sealed Sources, Formaldehyde, Hazardous Waste Numbers and PCB Prohibition)**

- ☒ **Provided comments to NMED on Class 3 PMR (New Disposal Units)**

Audits

- ☒ **May 19-20: Surveillance of WTS Emergency Management, Carlsbad, NM (T. Klein)**
- ☒ **May 19-22: CBFO audit of INEEL, Idaho Falls, ID (B. Walker)**
- ☒ **May 27-29: WTS audit, Carlsbad, NM (B. Walker)**
- ☒ **June 16-20: CBFO recertification audit of Hanford, Richland, WA (J. Channell)**
- ☒ **June 17-19: EPA audit of WIPP Monitoring Program, Carlsbad, NM (T. Klein)**
- ☒ **July 9: New LANL Headspace Gas Sampling Equipment audit, Los Alamos, NM (S. Webb)**
- ☒ **July 14-16: CBFO audit of WTS, Carlsbad, NM (B. Walker)**
- ☒ **July 22-24: RFETS Solids Sampling and New NDA Equipment Certification audit, Denver, CO (S. Webb)**

Activities

- ☒ April 15-16: Panel 1 closure, Panel 2 opening ceremony, DOE Roundtable Discussion, Carlsbad, NM (M. Silva)
- ☒ April 22-24: EPA/DOE Recertification Meetings, Carlsbad, NM (L. Allen)
- ☒ April 28: Tour of RH-TRU facility, Oak Ridge, TN (G. Anastas)
- ☒ April 29: DOE Pre-submittal Public Meeting on RCRA PMRs, Santa Fe, NM (J. Channell)
- ☒ June 3: Public Information Meeting on PMRs, Carlsbad, NM (B. Walker)
- ☒ June 3: Meeting with DOE for July '03 Radiochemistry Workshop, Carlsbad, NM (M. Silva, D. Gray)
- ☒ June 5: Public Information Meetings on PMRs, Santa Fe, NM (S. Webb, G. Anastas)
- ☒ June 11: WIPPTRAX 2003-1 Full Scale Exercise, Gallup, NM (G. Anastas)
- ☒ June 19: Interview for Public Channel 16, "Transportation of TRU to WIPP," (G. Anastas)
- ☒ June 29: PCB Permit Modification Public Hearing, Santa Fe, NM (J. Youngman, L. Allen)
- ☒ June 30: Public Meeting, Proposed Pit Facility, Carlsbad, NM (M. Silva, J. Channell, B. Walker, J. Youngman)
- ☒ July 7-9: Conceptual Model (Spallings) Peer Review, Albuquerque, NM (L. Allen)
- ☒ Periodic EMIG Meetings (T. Klein)

EEG Presentations/Publications

- ☑ **May 2003: EEG-85 (L. Allen, J. Channell)**
 - “Analysis of Emplaced Waste Data and Implications of Non-Random Emplacement For Performance Assessment for the WIPP”

- ☑ **May 19: NAS/NRC Committee on Optimizing the Characterization and Transportation of Transuranic Waste for the Waste Isolation Pilot Plant, Washington, DC (M. Silva)**
 - “EEG Response to NAS WIPP Committee Questions for May 19, 2003 Meeting.”

- ☑ **June 16: Plenary Session, Scientific Basis for Nuclear Waste Management XXVII, Kalmar, Sweden (M. Silva)**
 - “Public Oversight of the WIPP Repository, USA.”

EEG Presentations/Publications (continued)

☑ **July 15 & 16: 2003 Radiochemistry
Conference, Carlsbad, NM.**

- “Radiological Environmental Monitoring of the WIPP Project by EEG During 2002,” (D. Gray, T. Klein, S. Ballard)
- “Chernobyl, Causes of the Accident and the Environmental Legacy,” (G. Anastas)

☑ **July 21 & 24: 48th Annual Meeting of the
Health Physics Society, San Diego, CA**

- “Scientific Advantages and Absurdities of SI Units in Radiation Protection,” (G. Anastas)
- “Transuranic Waste Shipments in Double Contained Packages,” (J. Channell)

Meetings

- ☒ **May 19: NAS/NRC WIPP Committee on Optimizing the Characterization and Transportation of Transuranic Waste for the Waste Isolation Pilot Plant, round table discussion, Washington, DC (M. Silva)**
- ☒ **May 29: WIPP Transportation Technical Advisory Group – Rail Meeting, Western Governors' Association, Portland OR (M. Silva)**
- ☒ **June 16-18: Scientific Basis for Nuclear Waste Management XXVII, Kalmar, Sweden (M. Silva)**
- ☒ **June 16-18: International Workshop on Radiological Sciences and Applications: Issues and Challenges of Weapons of Mass Destruction Proliferation, Radiochemistry Society, Albuquerque, NM (G. Anastas)**
- ☒ **July 13-16: 2003 Radiochemistry Conference, Carlsbad, NM (D. Gray, G. Anastas, M. Silva)**